REMARKS

Claims 11-14 are currently pending in the present application.

In the Office Action, the Examiner rejects claims 11-14 under 35 U.S.C. §103(a), as being unpatentable over U.S. Patent 6,660,344 of Lub, in view of U.S. Patent 6,183,822 of Farrand, *et al.*

While not necessarily agreeing with any of the arguments and contentions in support of the Examiner's rejection, Applicants respectfully submit that Lub simply fails to qualify as prior art based on Applicants' earlier perfected priority date. Accordingly, the Examiner's rejection based upon the combination of Lub and Ferrand is improper and should be withdrawn.

The instant application claims priority under 35 U.S.C. §119(a)-(d) of Japanese Patent Application No. 2001-286652, which was filed on September 20, 2001.

Acknowledgement of the claim of foreign priority to this Japanese patent application and receipt of the certified copies of the priority document were acknowledged in the Office Action dated September 16, 2004. Additionally, Applicants submitted a Verified Translation of the Japanese application in conjunction with the response filed by Applicants on January 13, 2005, which was received by the Office on January 18, 2005. Accordingly, Applicants' foreign priority date has been perfected for the purposes of antedating the Lub reference. The effective U.S. filing date of the Lub reference is October 3, 2001, which is after Applicants' priority date.

Reconsideration and withdrawal of the Examiner's rejection in light of Applicants' earlier priority date are respectfully requested.

In view of the remarks set forth above, Applicants submit that all pending claims patentably distinguish over the prior art of record and known to Applicants. Reconsideration, withdrawal of the rejection and a Notice of Allowance are respectfully requested.

Respectfully submitted,

Takuya Matsymoto, et al.

Milienber 14 201 By:

AARON R. ETTELMAN Registration No. 42,516

AKIN GUMP STRAUSS HAUER & FELD LLP

One Commerce Square

2005 Market Street, Suite 2200 Philadelphia, PA 19103-7013 Telephone: 215-965-1200

Direct Dial: 215-965-1240 Facsimile: 215-965-1210

E-Mail: aettelman@akingump.com

ARE:rc